

## **EXHIBIT 16**

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

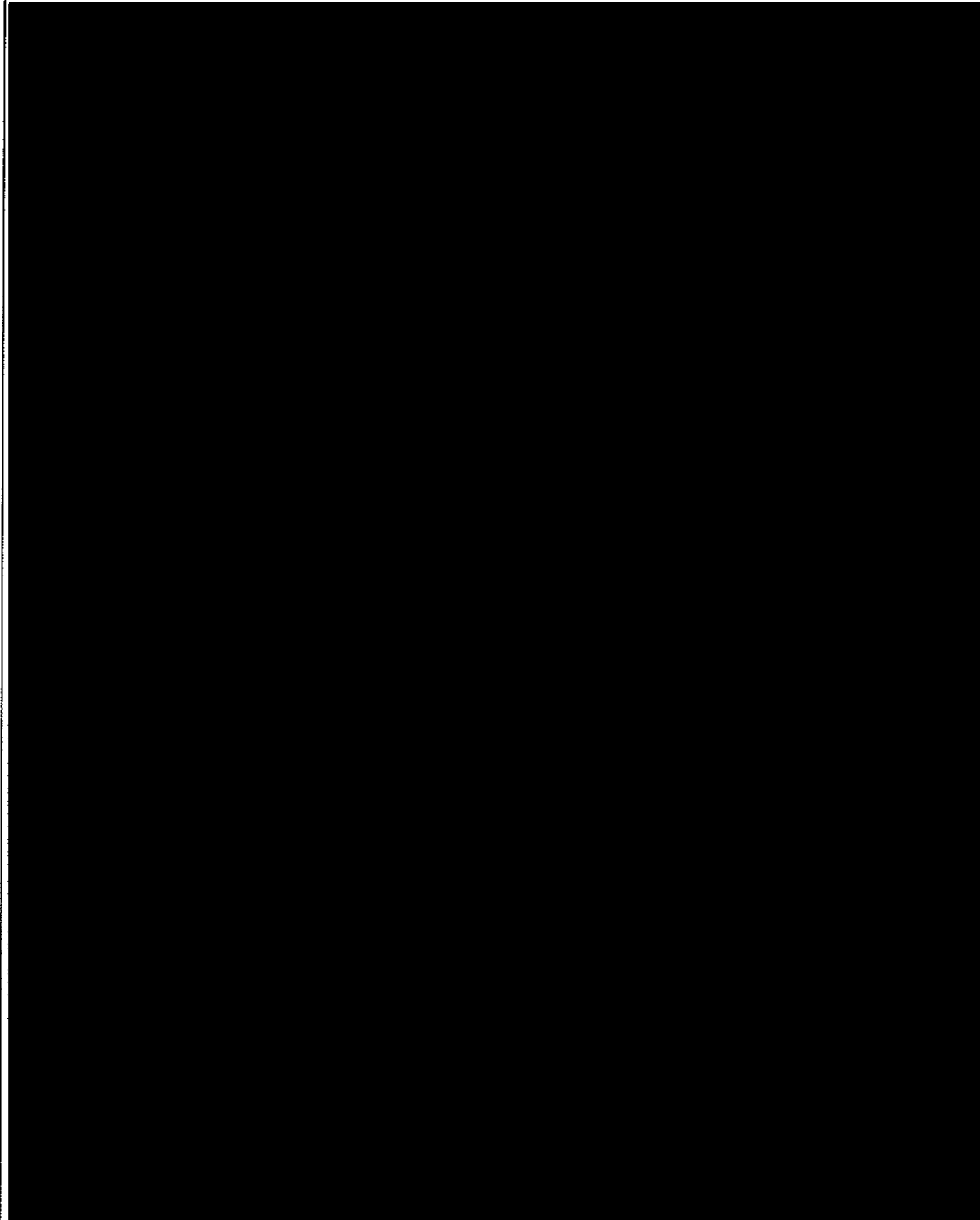
24

25

26

27

28

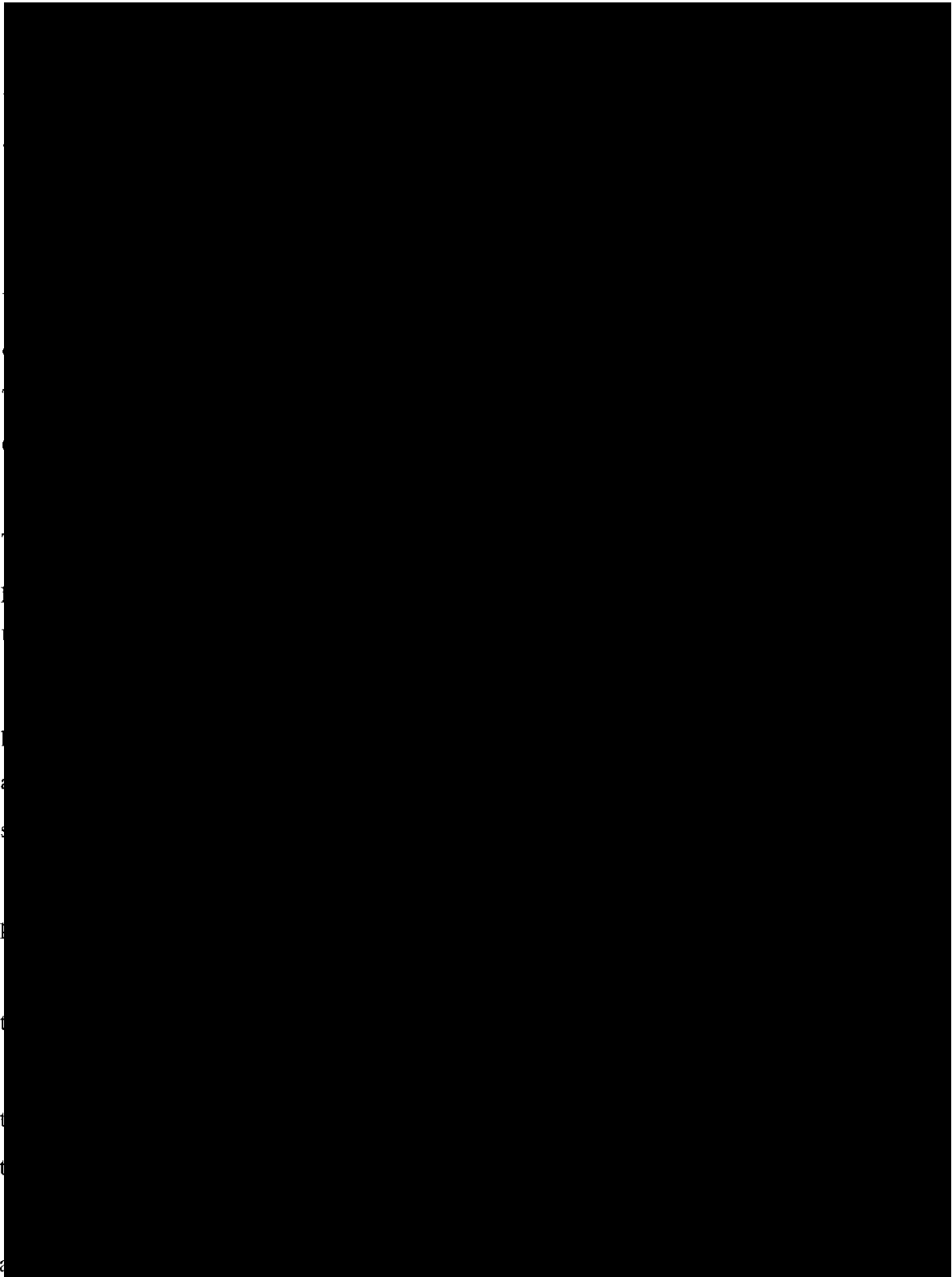


LA 51561465

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



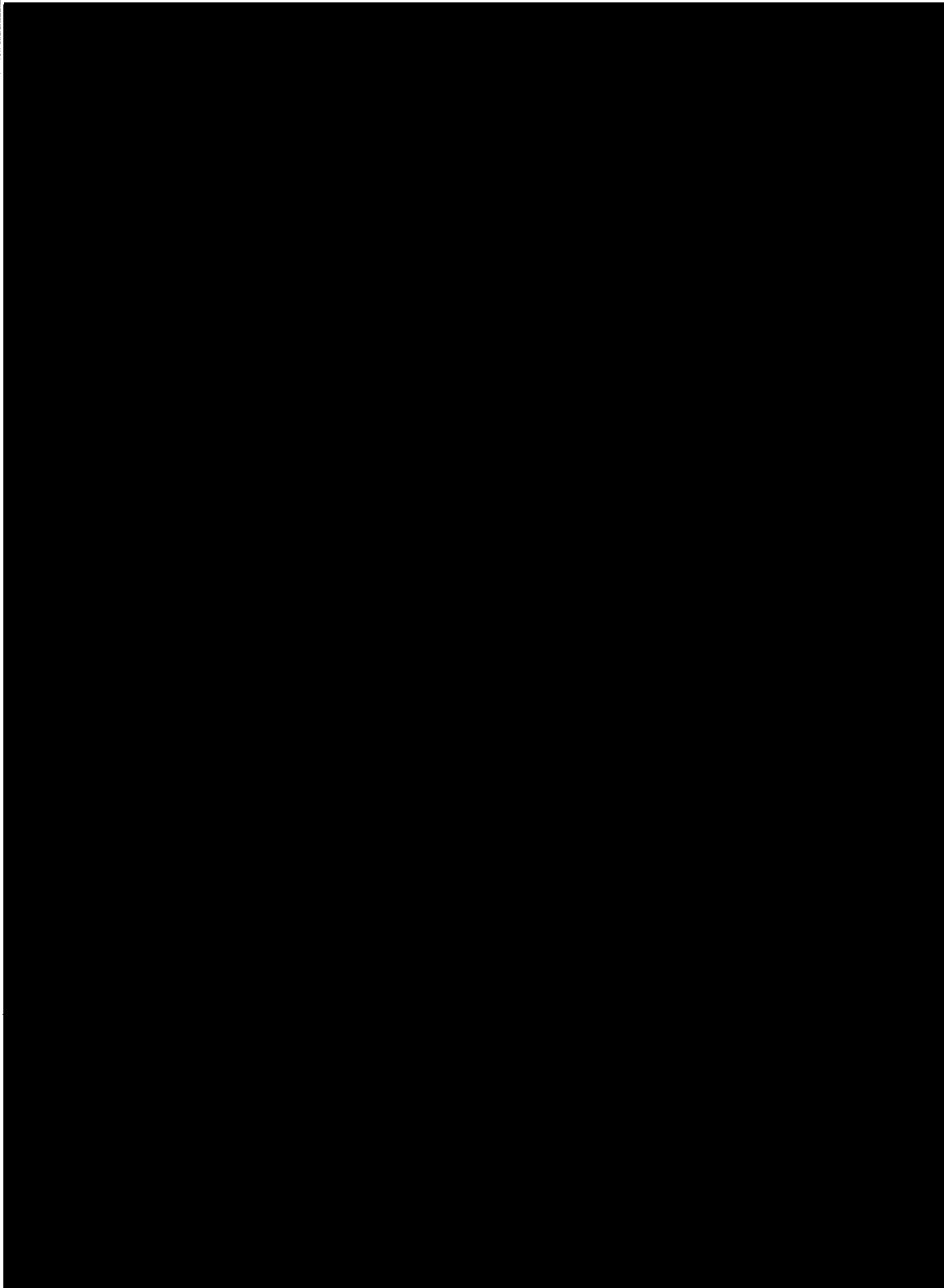
LA 51561465

- 1 -

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

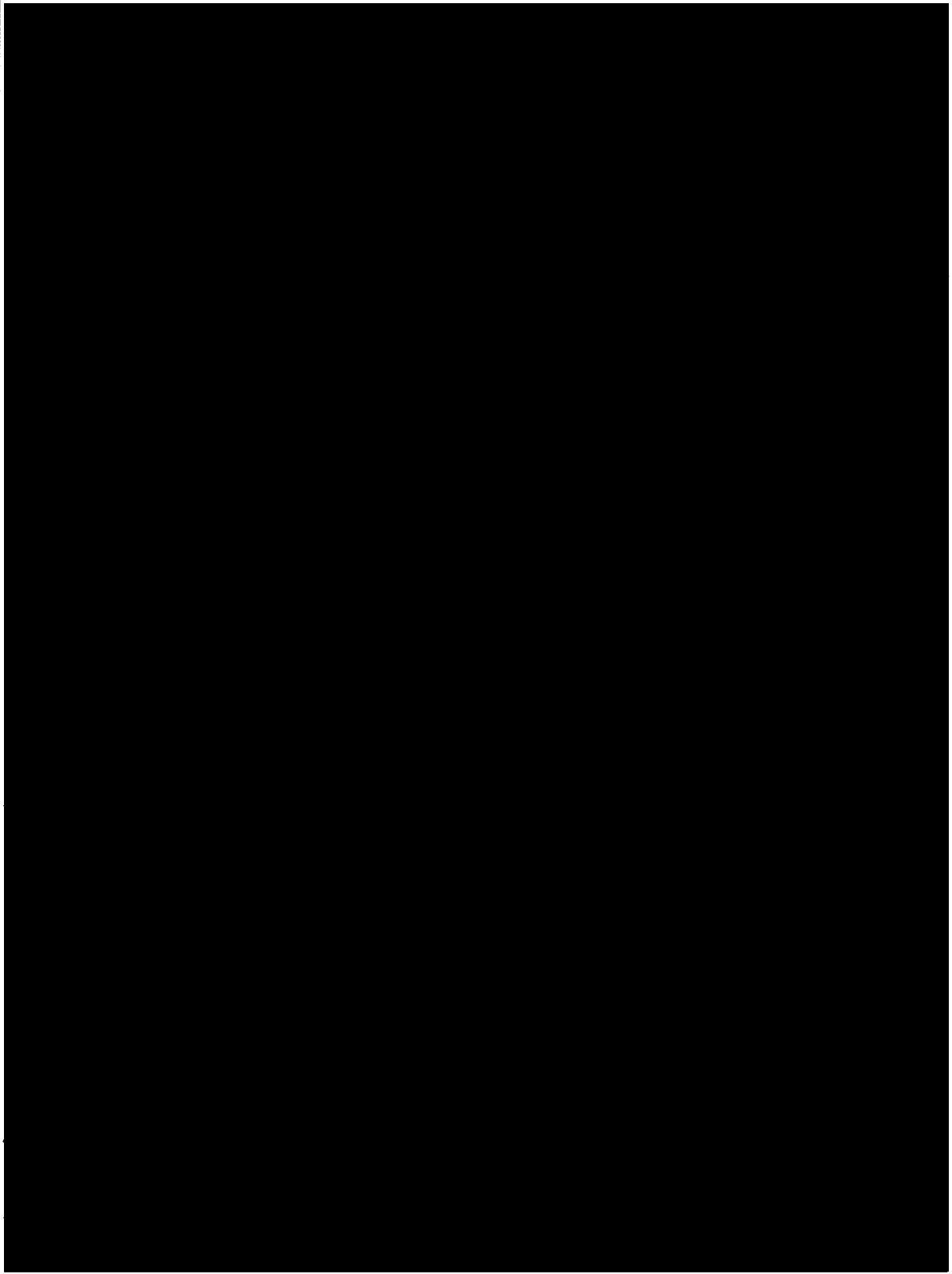
- 2 -

RESPONSE OF DEFENDANT TRANS UNION LLC TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
Case No. 3:12-cv-00632-JSC

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

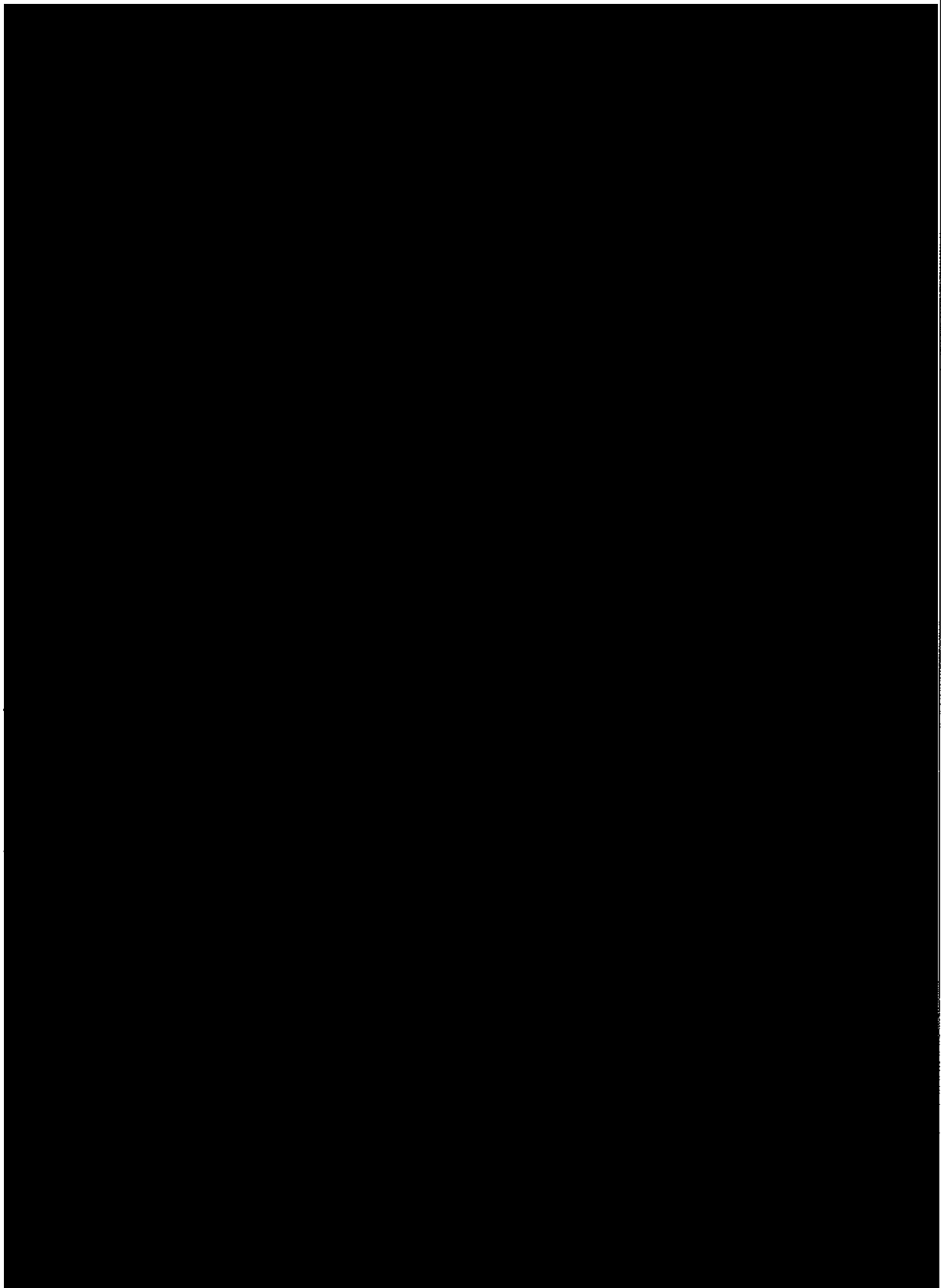
- 3 -

RESPONSE OF DEFENDANT TRANS UNION LLC TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
Case No. 3:12-cv-00632-JSC

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

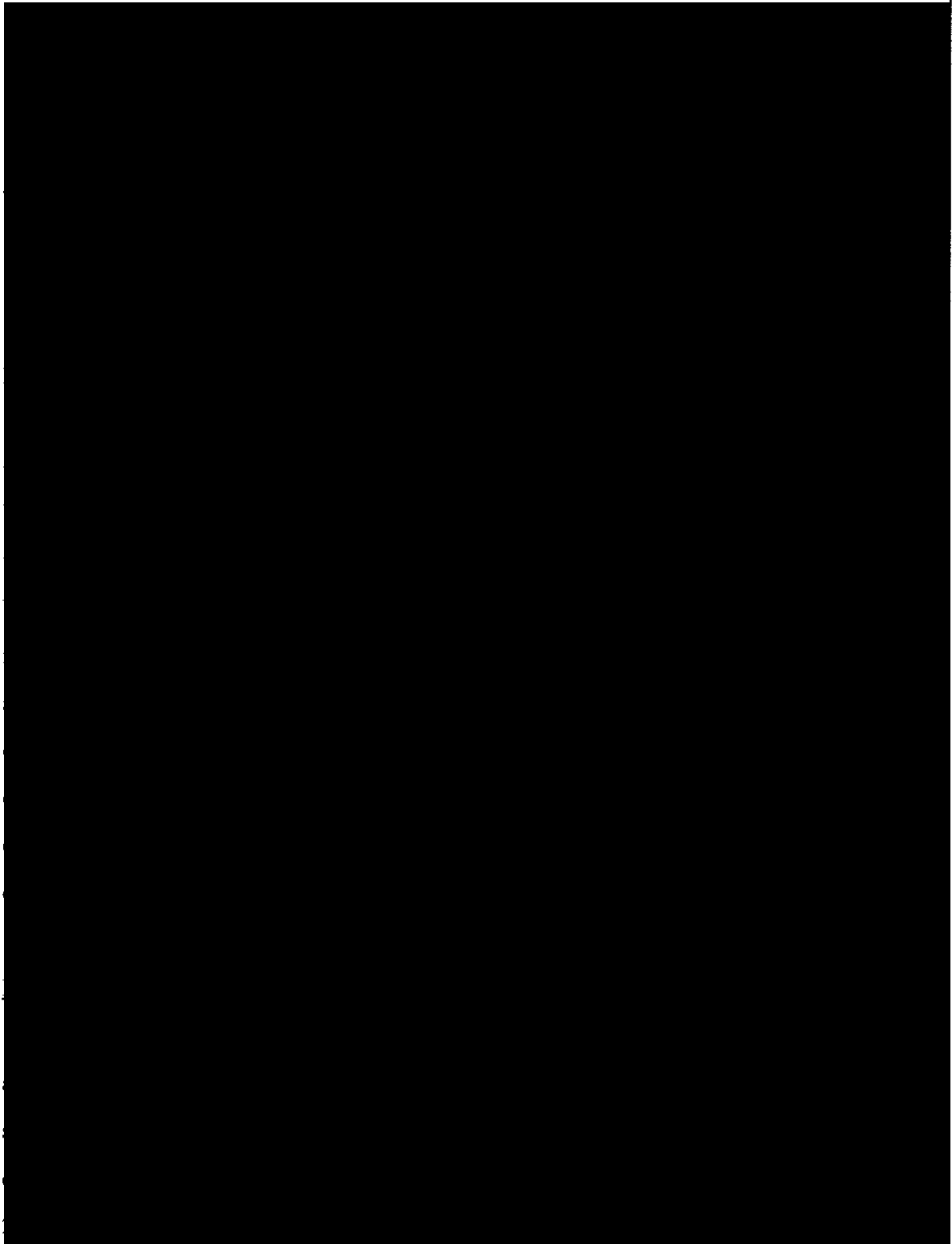
- 4 -

RESPONSE OF DEFENDANT TRANS UNION LLC TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
Case No. 3:12-cv-00632-JSC

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



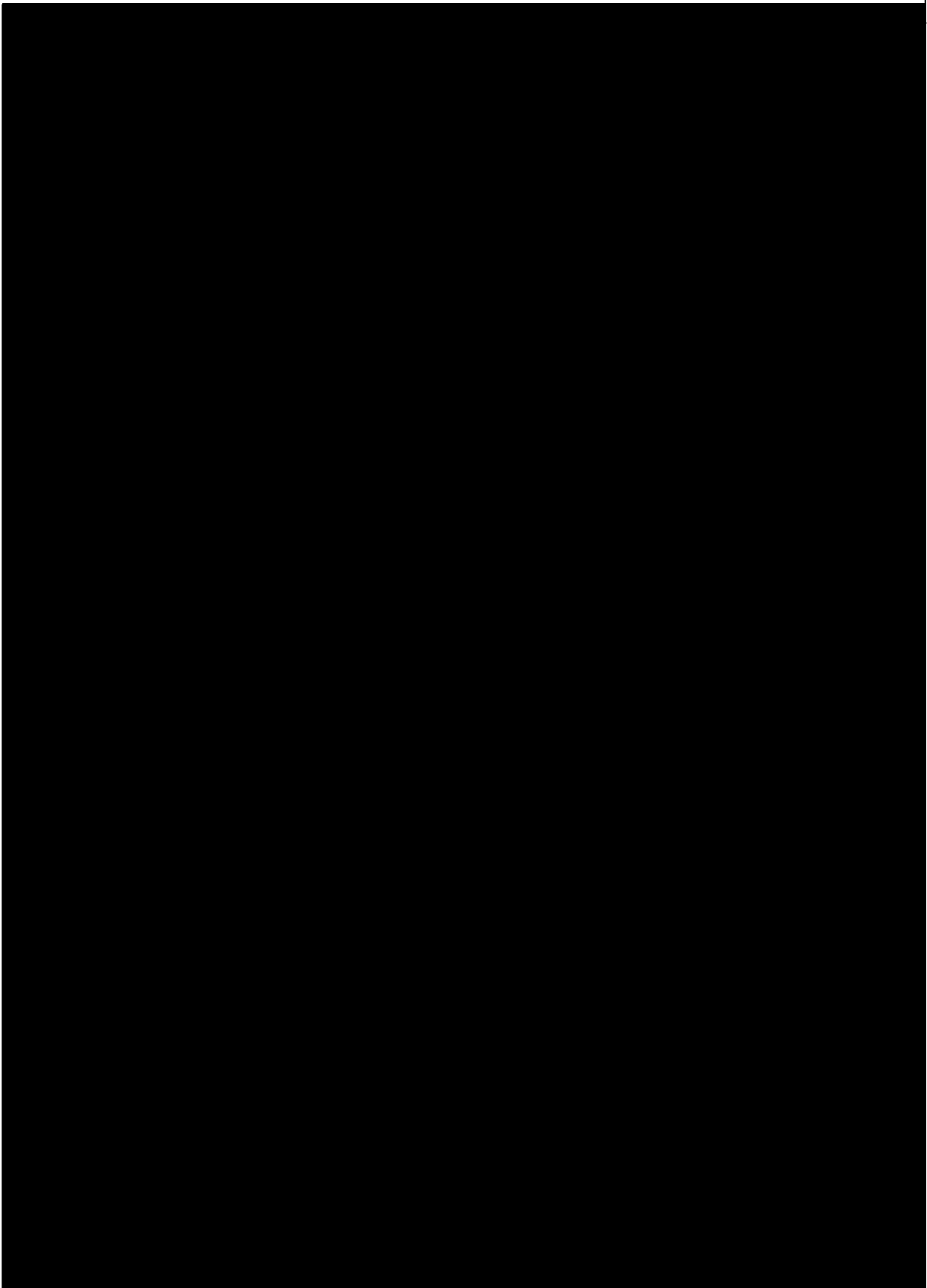
LA 51561465

- 5 -

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

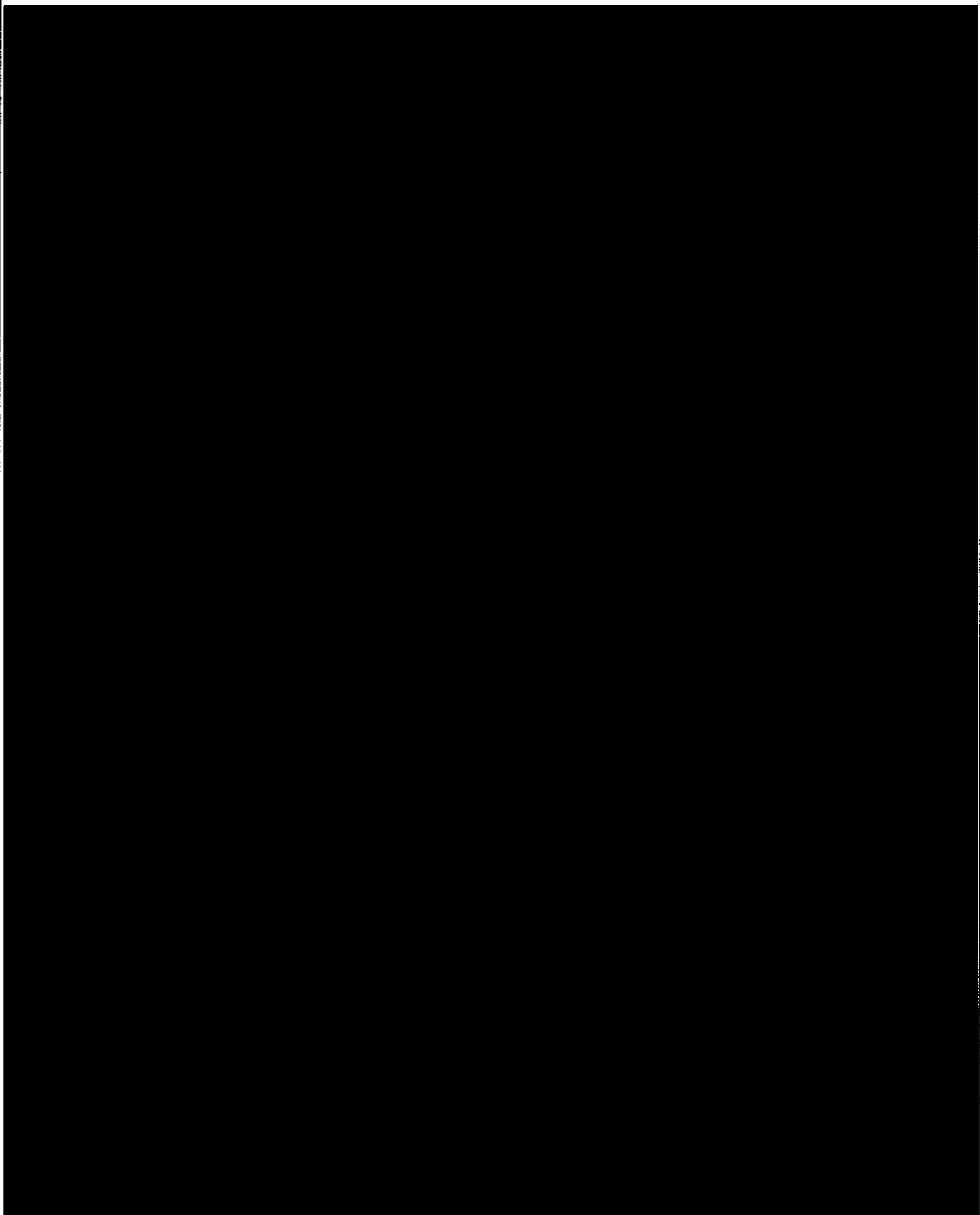
- 6 -



-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

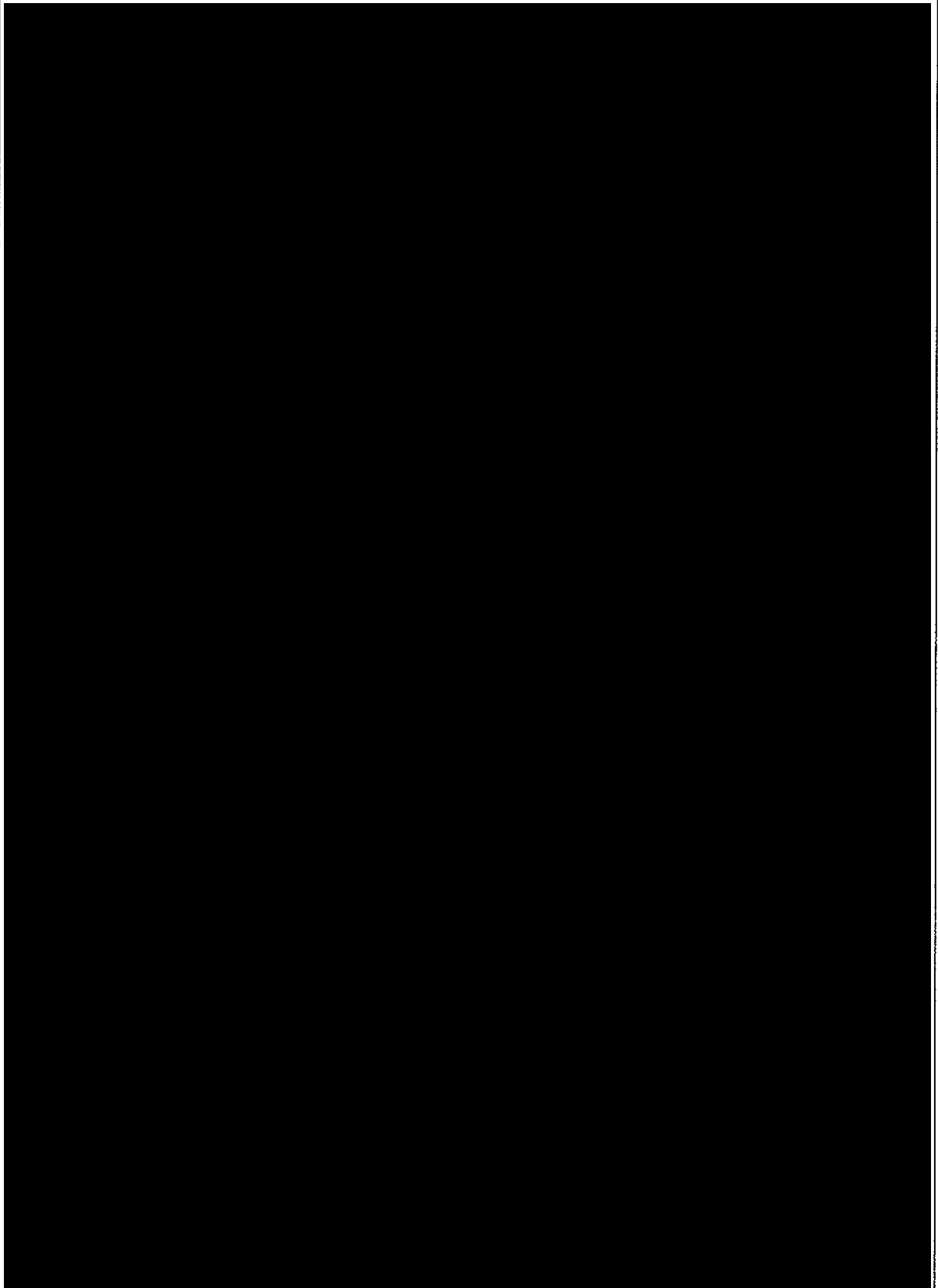
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



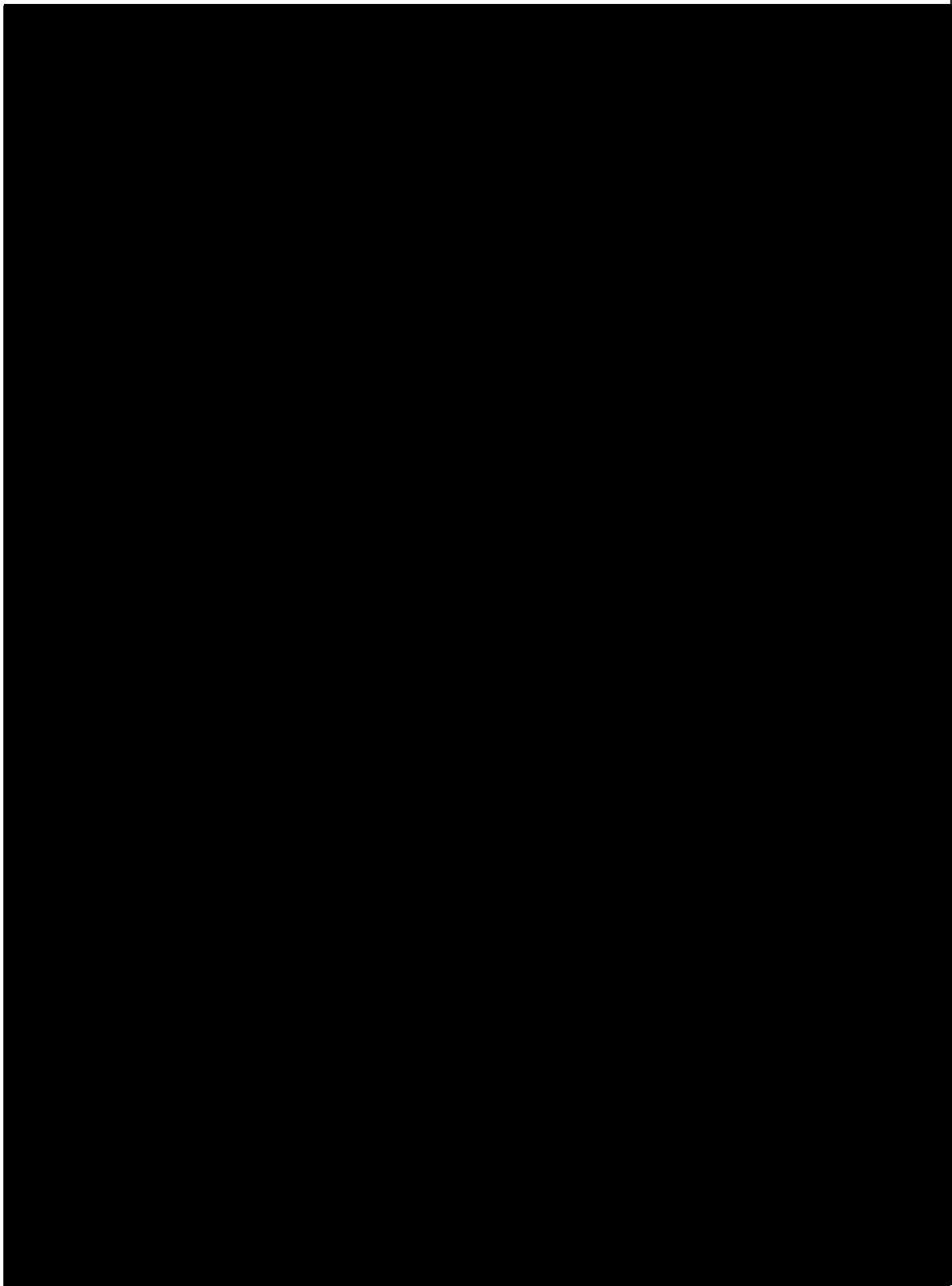
LA 51561465

- 8 -

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

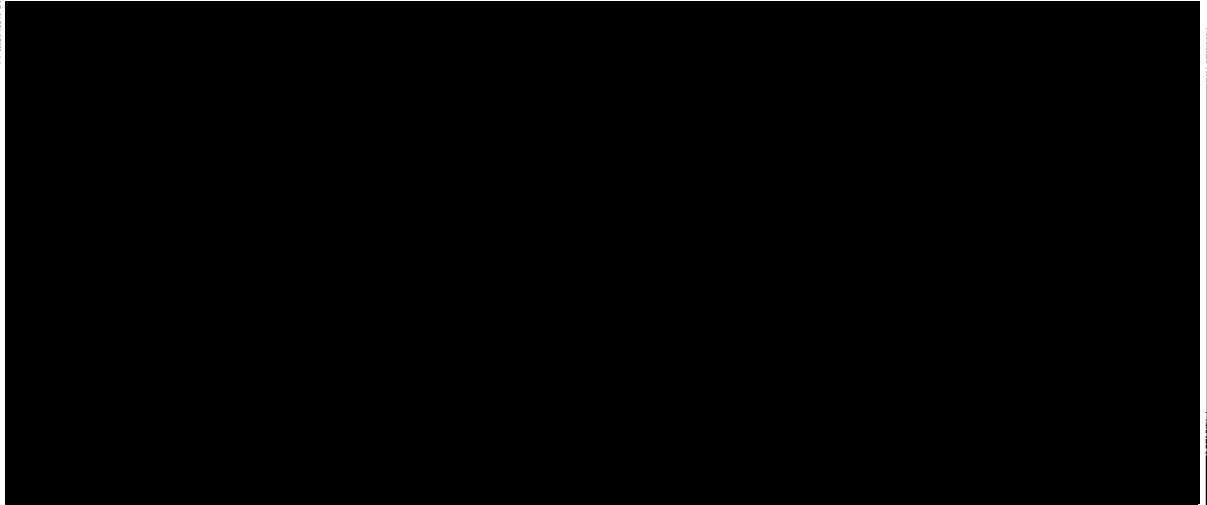
STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

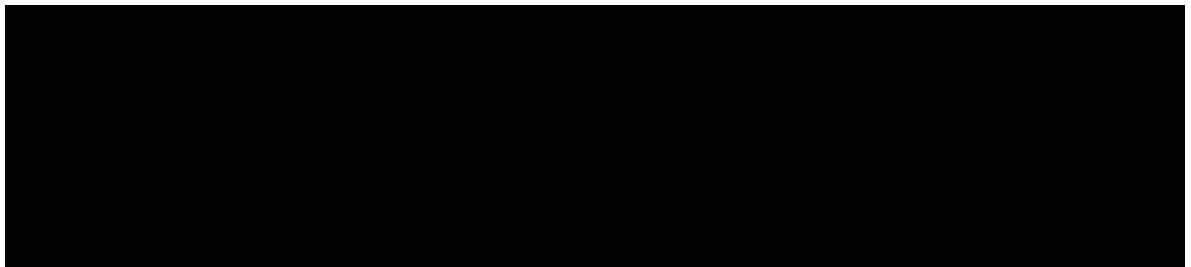


**INTERROGATORY NO. 14:**

State the number of natural persons in the United States who have made a dispute to Trans Union regarding an erroneous inclusion on an OFAC record from February 9, 2010 through the present.

**RESPONSE TO INTERROGATORY NO. 14:**

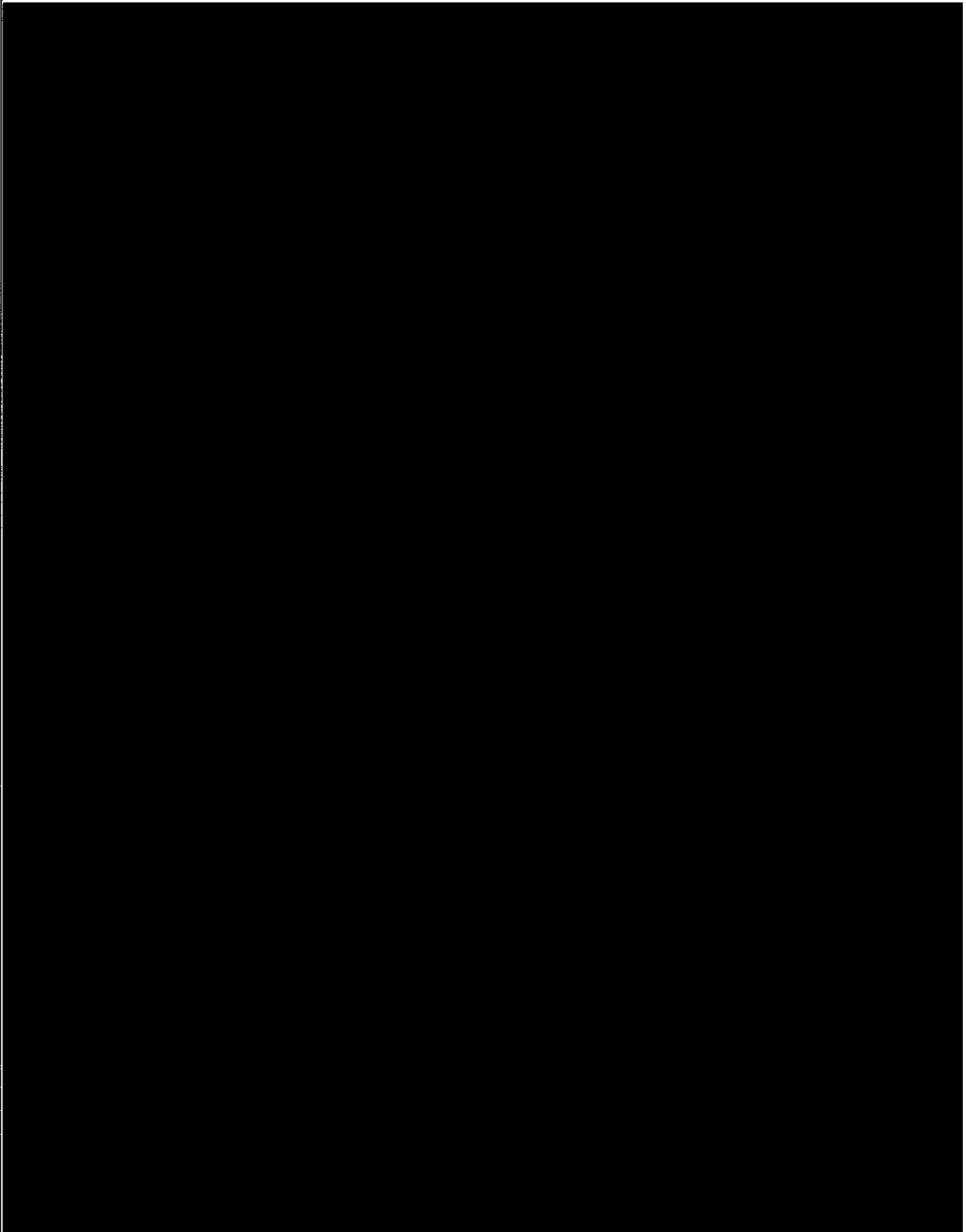
Trans Union objects to this Interrogatory on the grounds, among others, that: (i) it is vague and ambiguous; (ii) it is overly broad, burdensome and harassing; (iii) it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this action because no reinvestigation or dispute claim is asserted; and (iv) it seeks confidential, proprietary business information that belongs to Trans Union. Without waiving and subject to, these objections and the General Objections, Trans Union responds to this Interrogatory as follows: Approximately 493.



-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

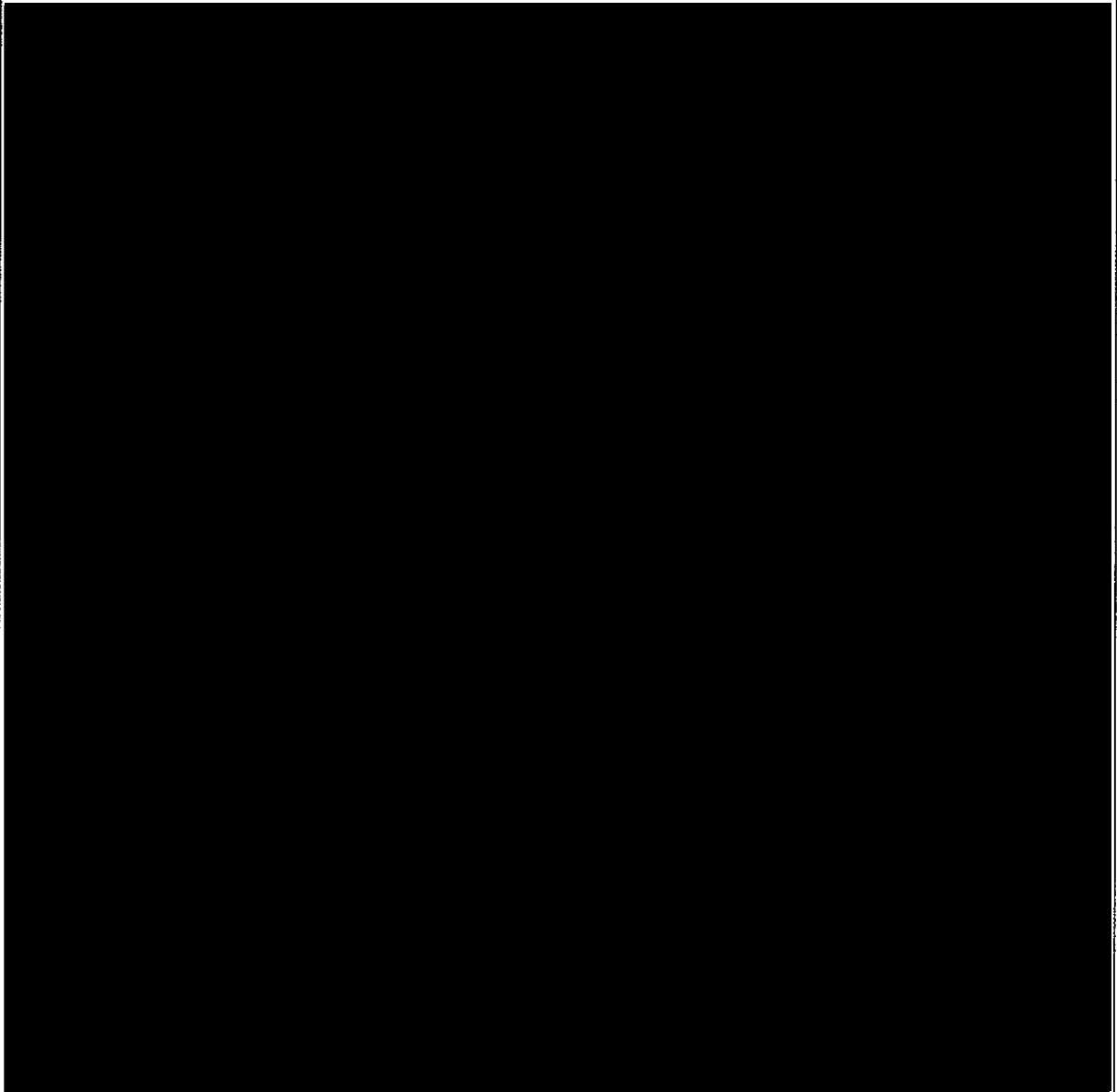
- 11 -

RESPONSE OF DEFENDANT TRANS UNION LLC TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
Case No. 3:12-cv-00632-JSC

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465

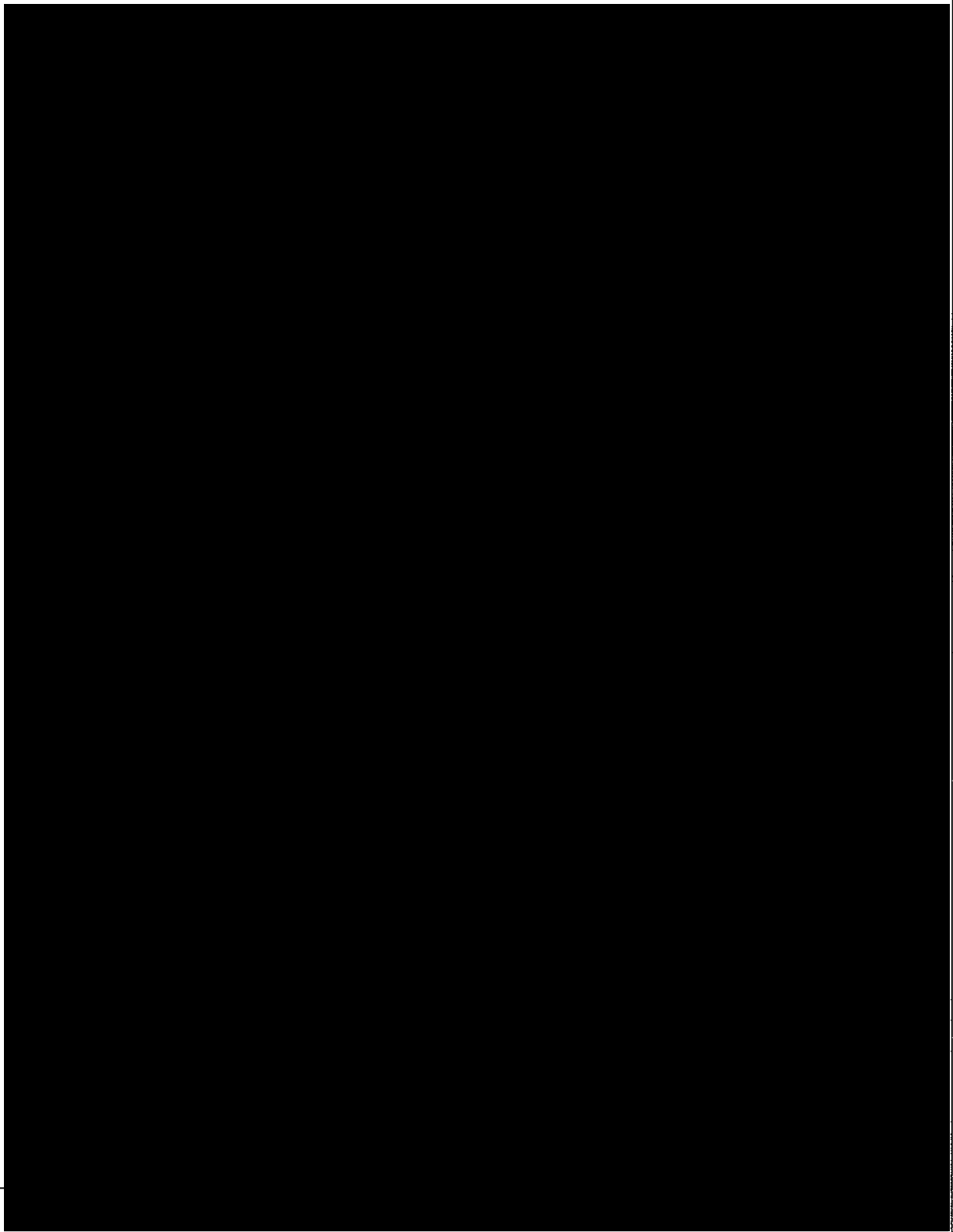
- 12 -

RESPONSE OF DEFENDANT TRANS UNION LLC TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
Case No. 3:12-cv-00632-JSC

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

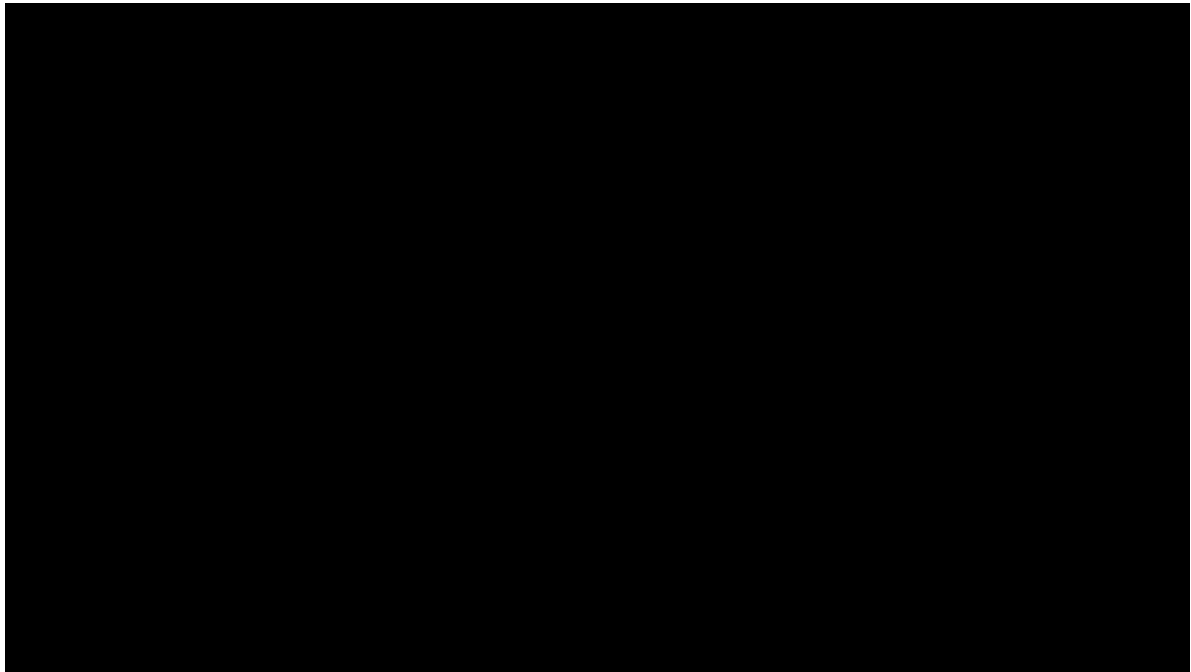


LA 51561465

-- REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED --

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



LA 51561465